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August 12, 2019

**BY E-MAIL**

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**Re: West Publishing Corporation v. LegalEase Solutions, LLC  
Response to Subpoena *Duces Tecum* to ROSS Intelligence, LLC**

Dear Peter:

This letter is a follow-up to our discussion on July 15 and your production of certain documents on July 25 as well as in response to your written objections to the subpoena *duces tecum* served in the above-referenced matter (the "Subpoena"). We are writing to confirm ROSS's commitment to producing certain categories of documents in response to the Subpoena, as we do not believe that we have at least those documents that you have committed to produce. Please confirm whether or not you have completed your production of documents as set forth below. If not, please confirm when you will complete your production.

During our call on Monday, July 15, you explained that ROSS was willing to produce four categories of documents:<sup>1</sup>

1. Contracts and agreements between ROSS and LegalEase Solutions, LLC ("LegalEase"), including the master services agreement and any corresponding statements of work, regardless of time period;
2. The "ROSS Classifier Data Set," consisting of the documents and information created in connection with work that Ross and/or LegalEase has referred to as the "ROSS classifier project;"

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<sup>1</sup> Although the Subpoena calls for production of documents in Boston, Massachusetts, during our call on July 11, 2019, you indicated that ROSS would treat the location of production as Minneapolis, Minnesota, and would not otherwise object to the subpoena on that particular basis. This is also set forth in your objection letter dated June 28, 2019 (the "June 28 Letter").

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3. The "LPO Data Set," which you referred to as consisting of the thousands of memorandums that LegalEase, and possibly other third-parties working at LegalEase's direction, transferred to ROSS; and
4. Emails collected from ROSS employees who were involved, directly or indirectly, with Ross's work with LegalEase. This would include both external communications with LegalEase and internal communications concerning LegalEase or its work.

Given the fact discovery deadline of September 30, 2019, we ask that you provide us with your document production as soon as possible, but no later than Wednesday, August 14, in order to provide sufficient time for any further negotiations with you as to the scope of Ross's discovery or motion practice if needed. As we explained during our call, depending on the contents of ROSS's document production, West reserves its right to seek a complete production of all documents requests under the Subpoena.

Also, during our call on July 15, you indicated that ROSS would be willing to provide Slack communications related to LegalEase provided that West would agree to cover at least some of the associated costs. We believe that you were going to identify for us an estimate of the costs that would be required to collect and produce those communications (exclusive of any costs incurred to review those documents for privilege). We have not received that estimate. We ask that you provide us with an estimate of the costs associated with producing the Slack communications as soon as possible so that West can evaluate its options regarding these communications.

Regards,



Scott Lashway